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April 23, 2020

VIA ECF

Hon. Lorna G. Schofield
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, New York 10007

Re: 19-cv-10475 (LGS-DCF), *Annie Farmer v. Darren K. Indyke, et al.*

Dear Judge Schofield:

Pursuant to this Court's directive at the conference held on April 16, 2020, I write to advise the Court that Ms. Maxwell intends to file a motion to dismiss under Fed. R. Civ. P. 12.

While the defenses we intend to raise by pre-answer motion may be asserted and preserved in an answer, we respectfully submit that it promotes efficiency and conserves the parties' resources for Ms. Maxwell to assert some defenses now, e.g., meritorious arguments that one or more claims are legally deficient or venue is improper.

Counsel respectfully suggests a briefing schedule wherein the Motion is filed by May 14, plaintiff responds by June 4, and the reply is due June 18.

Respectfully Submitted,

Laura A. Menninger

CC: Counsel of Record *via* ECF